

EXHIBIT E

1 Q. Did you vote in the 2020
2 presidential election?

3 A. Yes.

4 Q. Did you vote in person or by mail?

5 A. I voted early. I don't remember if
6 it was in person or at the board of elections
7 or if it was by mail. I do one or the other
8 most times.

9 Q. How did you deliver the ballot?

10 A. I'm not sure if I mailed that
11 particular election or I went down and voted
12 early at your board of elections.

13 Q. Have you ever voted in person for
14 any federal, state or local election in the
15 past?

16 A. Yes, I have.

17 Q. Did you -- have you ever voted in
18 person after the 2020 presidential election?

19 A. Only early vote in person, early
20 vote.

21 Q. That's the same method you were
22 describing earlier?

23 A. Yes.

24 Q. Who did you vote for in the 2020
25 presidential election?

1 Q. Aside from the phrase you just
2 mentioned, is there any reason -- other reason
3 that you think the caller of the Robocall was
4 Black?

5 A. Just the feeling I had listening to
6 it.

7 Q. At the time you received the
8 Robocall, were you intimidated by it?

9 A. No, I was angered by it.

10 Q. Well, you mentioned before that --
11 withdrawn.

12 What specifically about the
13 Robocall leads you to believe it was designed
14 to intimidate?

15 A. Because it was threatening that the
16 police would come after you. Your credit card
17 company would come after you and the CDC would
18 target you for mandatory vaccinations. That
19 sounds a little threatening to me.

20 Q. Now, is it fair to say that that is
21 your opinion?

22 A. Yes.

23 Q. Did you research the accuracy of
24 any of the statements contained in the
25 Robocall?

1 No, at this point, I never thought about it.

2 Q. Now, looking at the next sentence
3 where it says, "don't be finessed with giving
4 your private information to the man."

5 Do you see where I'm referring to?

6 A. I do.

7 Q. Now, is it your testimony that
8 based on that statement, you identify the
9 caller to be Black?

10 A. No.

11 Q. So how did you -- so what is
12 your -- when you -- before, did you testify
13 that you believe that the caller was Black
14 because she used a statement giving you private
15 information to the man?

16 MR. GOLD: Objection.

17 A. I said that the gist of the
18 language that was used and the tone of the call
19 made me think that.

20 Q. What specifically about the
21 minority -- withdrawn.

22 When you said earlier -- when you
23 testified that you believe that the Robocall
24 was designed to scare the minority community,
25 which minorities are you specifically referring

1 to?

2 A. Lower income people and Black
3 people.

4 Q. Is it your testimony that a lower
5 income person constitutes a minority
6 irrespective of race?

7 MR. GOLD: Objection.

8 A. No.

9 Q. So when you used the phrase lower
10 income people, who specifically are you
11 referring to?

12 A. I am referring to the demographic
13 and the area where this Robocall went out.

14 Q. What specifically would that
15 demographic be?

16 A. It is a heavily minority and low
17 become area.

18 Q. And before you indicated you
19 testified that -- you believe that this was
20 also geared toward the Black community; is that
21 correct?

22 MR. GOLD: Objection.

23 A. Yes, that's where it was broadcast.

24 Q. Well, again, Ms. Slaven, that is
25 merely your opinion, correct?

1 MR. GOLD: Objection.

2 A. It's my opinion based on who I know
3 received the call and who I know that did not.

4 Q. Who do you know that received the
5 call?

6 A. A lot of people in East Cleveland.

7 Q. Specifically who?

8 A. Our house, Eda's house. I heard
9 other people talking about it at meetings. I
10 know it was hit in East Cleveland.

11 Q. The people that you heard talking
12 about it at the meetings, did any of them --
13 are any of them members of a minority
14 community?

15 A. Yes.

16 Q. Have you personally spoken to
17 anyone in the Black community who received this
18 call?

19 A. No.

20 Q. Why not?

21 A. I just haven't.

22 Q. You were angered by it, though?

23 A. Yes.

24 Q. You thought it was designed to
25 target the Black community, why didn't you

1 in any way?

2 A. I think the idea that policemen
3 might show up at your door and knock on a door
4 for a warrant gives a threat that there might
5 be physical confrontation.

6 Q. Could that not happen if you have a
7 pending warrant anyway?

8 MR. GOLD: Objection.

9 A. I imagine it could.

10 Q. Is it your testimony at that --
11 withdrawn.

12 Do you think that you are more
13 intelligent than members of the Black
14 community?

15 MR. GOLD: Objection. Harassing
16 question.

17 A. Certainly not.

18 Q. Have you personally spoken to any
19 member of the Black community who claims to
20 have been intimidated by the Robocall?

21 MR. GOLD: Objection. Asked and
22 answered.

23 A. I said I didn't have any specific
24 conversations to point to.

25 Q. Not even as a canvasser?

1 Q. Anything else?

2 A. No.

3 Q. Have you spoken to any member of
4 the Black community who claims to have been
5 threatened by the Robocall?

6 MR. GOLD: Objection.

7 A. I already said I don't recall any
8 specific conversations.

9 Q. Well, before I ask about
10 intimidation. Now I'm asking about threats.

11 A. Seems pretty close to the same
12 thing.

13 Q. Different question.

14 A. Same answer.

15 Q. At the time you received the
16 Robocall, were you personally coerced?

17 MR. GOLD: Objection, vague.

18 A. I don't even know what you mean by
19 that.

20 Q. Do you understand what the word
21 coerced means?

22 A. I do.

23 Q. Did you feel coerced by the
24 Robocall?

25 A. I feel like Robocall was trying to

1 Q. What if anything do you know about
2 mail-in voting?

3 MR. GOLD: Objection.

4 A. You have to be a little more
5 specific. It seems like a broad question.

6 Q. It is a broad question. What do
7 you know about it?

8 A. It's one of the methods that we can
9 vote with.

10 Q. How exactly is mail-in voting
11 implemented?

12 MR. GOLD: Objection,
13 argumentative.

14 Q. I'll withdraw the question.
15 What is your opinion of mail-in
16 voting?

17 A. It would be a good option if it
18 were reliable.

19 Q. Do you think that mail-in voting is
20 reliable?

21 A. Not always.

22 Q. What are some of the problems with
23 mail-in voting?

24 A. Ballots don't arrive on time in
25 either direction.

1 MR. GOLD: Objection.

2 A. What was the beginning of that call
3 I was still reading it?

4 Q. No problem. What is the basis of
5 your allegation in paragraph 53 that the tone
6 or language and content of the call is designed
7 to deceive and intimidate Black voters in
8 particular?

9 A. What's my basis for that?

10 Q. Correct.

11 A. It's my impression from the tone of
12 the message I heard.

13 Q. So once again, your allegation is
14 that it was designed to intimidate the Black
15 community in particular?

16 MR. GOLD: Objection.

17 A. I believe that that seems to be who
18 it was targeting.

19 Q. What is the basis of this opinion?

20 A. My understanding of who was
21 targeted in the call.

22 Q. What is the basis of your
23 understanding?

24 A. It was targeted to minority areas
25 in particular.

1 Q. Aside from it being targeted to
2 minority areas, what if anything is your basis
3 for saying that it was targeting Black voters
4 in particular?

5 MR. GOLD: Objection.

6 A. It seemed to push a lot of
7 stereotypes.

8 Q. What are some of those stereotypes
9 do you think it's pushing?

10 MR. GOLD: Objection.

11 A. That credit collectors and police
12 would come after you and the CDC.

13 Q. What is it about credit collectors
14 that would target the Black community over
15 another community in particular?

16 MR. GOLD: Objection.

17 A. It's not just a Black community.
18 It's people that are poor.

19 Q. I understand that but the statement
20 in your complaint refers to the Black
21 community. My question is what about creditors
22 would target the Black community in particular?

23 MR. GOLD: Objection.

24 A. 'Cause your society tends to target
25 higher interests rates on loans and everything

1 Q. How much work did you miss out on
2 because of the Robocall?

3 MR. GOLD: Objection.

4 A. No idea.

5 Q. How much money did you lose out on
6 because of the Robocall?

7 A. No idea.

8 Q. Are you paid hourly or are you on
9 salary?

10 MR. GOLD: Objection.

11 A. Salary.

12 Q. Were you -- are you alleging that
13 you took time off of work because of the
14 Robocall?

15 A. No.

16 Q. So how is it that the Robocall
17 forced you to miss work?

18 A. I'm just saying it's wasting my
19 time. You are the one that asked me to
20 quantify how that time would cost me.

21 Q. Aside from your wasted time, did
22 you waste time as a result of the Robocall?

23 A. No.

24 Q. As a result of the Robocall, did
25 you sustain any psychological or emotional

1 injuries?

2 MR. GOLD: Objection.

3 A. Injuries is a little bit vague.

4 Q. I mean -- alright. Were you
5 diagnosed with any medical, psychological or
6 emotional condition because of the Robocall?

7 A. No.

8 Q. Did you speak any type of mental
9 health treatment as a result of the Robocall?

10 A. No.

11 Q. Did the Robocall affect the method
12 by which you voted in the 2020 presidential
13 election?

14 MR. GOLD: Objection.

15 A. I don't think so.

16 MR. KLEINMAN: Give me 10. I think
17 I'm basically done.

18 (Whereupon, an off-the-record
19 discussion was held.)

20 MR. KLEINMAN: As I've just
21 indicated off the record to Ms. Slaven
22 and Mr. Gold, I have no further
23 questions at this time but will reserve
24 my right to rebuttal if necessary.
25